REMARKS

The courtesies extended to the undersigned by Examiner David Banh and Primary Examiner Daniel Colilla, during the interview held December 30, 2008, are acknowledged and appreciated. As discussed during the interview, applicants, their principal representatives in Germany, and the undersigned have carefully reviewed the Final Office Action of October 2, 2008 in the subject U.S. patent application, together with the prior art cited and relied upon in the rejections of the claims. In response, the claims of the application have again been amended in an effort to more clearly patentably define the subject invention. As discussed during the interview, and as will be discussed below, it is believed that the claims now pending in the application are patentable over the prior art cited and relied upon. A Request for Continued Examination is being filed concurrently to provide the Examiner with an additional opportunity to consider these claims. Reexamination and reconsideration of the application, and allowance of the claims is respectfully requested.

As was discussed during the interview, the subject invention is directed to the provision of spaced lateral frame plates, each of which is provided with a plurality of prepared connection points, to assemble printing units and other elements of a printing press installation. The provision of each of the lateral side frames with the plurality of prepared connection points allows an individual printing press installation to be configured to the end user's space configuration while essentially utilizing in-stock components. In other words, each printing press installation does not require the production of lateral side frames that have been produced only for that installation. The lateral side frames are generic in that each has a plurality of prepared connection points which can be used to secure operating elements and which can also be used to secure drive motors and drive gears. Such installations can be made to either or to

both of the lateral side frames, as depicted in figs. 9 and 10, to construct a printing press installation that will be adapted to the end user's physical space.

As may be seen in Fig. 9, and as is discussed starting at paragraph 058 of the Substitute Specification, in a first arrangement, as depicted at "Y" at the left of Fig. 9, there is shown a "left to right" press. This term is defined earlier in the Substitute Specification and describes the direction of travel of the paper web, as taken from the view of a press operator who is standing on an operating side of the press installation and who is viewing the installation. In this first embodiment, the operating side is side I because that is the side of the press installation on which the operating elements are installed. The drive motors and drive gears are, in this embodiment, installed on side II, which is the side opposite the operating side.

In the arrangement depicted in Fig. 9, the space of the print shop is generally square. A second press installation, depicted at "X" in the lower portion of Fig. 9, can also be installed in the same space. In this second installation, it may be best to install both the operating elements and the drive motor and gears both on the operating side, which is again identified as side I. This second embodiment of the press installation is a "right to left" press installation.

The arrangement depicted in Fig. 9 provides a space 1000 in which the press operating personnel can be located. The operating personnel space 1000 can also be the location of an operating console, depicted at 1001.

In another configuration, as depicted in Fig. 10, the two printing press installations are conformed as they would be adapted for placement in a long, thin print shop space. Now the two printing presses Y and X are still a "left to right" and a "right to left" press, respectively, but they are situated back to back instead of side by side. An operating personnel space 1000, which includes an operating console 1001, is still provided. In the "left to right" press, at the left of

Fig. 10, the operating elements are again on side I and the drive motors are again on side II. In the "right to lefty" press, at the right of Fig. 10, the operating elements and the drive motors and drive gears are all on side I.

These alternative arrangements are made possible by the provision of the lateral side frames each with a plurality of prepared connection points. Two such side frames are depicted in Fig. 5. Prepared connection points for the traversing devices 362, which are shown in Fig. 6, are shown in Fig. 5 at 397 on each of the lateral side frames. Hollow spaces 356 are shown on each of the lateral side frames and can be provided with releasable covers 357 and 358, again as seen in Fig. 5. In the depiction shown in Fig. 6, suitable switching and control devices 361 are positionable in the hollow space 359 of the lateral frame 352. The main drive 354 is situated on the hollow space 356 of the second lateral frame 353. This orientation can be reversed or both the operating elements and the drives can be situated on only one of the side frames. The operating elements, such as the switching and control devices, are positioned so that they can be easily accessed by the press operating personnel. Their location defines the so-called operating side of the press installation.

As described in the Substitute Specification, at various locations, the use of these side frames allows the production of printing presses and printing press systems using identical parts. Note the discussion at the last two sentences of paragraph 008. The location of the operating element 116, on the side that is intended for operation of the press, is set forth at paragraph 0029, again in the last two sentences. That paragraph also discusses the provision of the connecting locations in both frame walls 109 of the roll changer 100. Paragraph 0030 discusses a similar configuration of frame walls for the printing units. Paragraph 0046 specifically recites the provision of prepared connection points for the traversing devices, as discussed previously.

Paragraph 0047 further discusses the provision of appropriate connecting points for other operating mechanisms on both of the lateral frames. The location of the various drive motors on either one or the other, or possibly on both of the lateral frames is discussed starting at paragraph 0057 and in connection with the printing press assemblies depicted in Figs. 9 and 10.

In the Final Office Action of October 2, 2008, claims 19, 29-33, 35 and 36 were rejected under 35 U.S.C. 103(a) as being unpatentable over U.S. Patent No. 6,408,746 to Weschenfelder in view of U.S. patent No. 6,167,806 to Chretinat. Claims 20-22 and 25-27 were rejected as being unpatentable over Weschenfelder in view of Chretinat and further in view of U.S. Patent No. 5,537,920 to Hasegawa. Claim 23 was rejected as being unpatentable over Weschenfelder in view of Chretinat and further in view of U.S. published Patent Application No. 2003/0048324 to Fujimoto. Claim 24 was rejected as being unpatentable over Weschenfelder in view of Chretinat, Hasegawa and Fujimoto. Claim 28 was rejected as being unpatentable over Weschenfelder in view of Chretinat and Hasegawa and further in view of U.S. Patent No. 5,640, 906 to Schmitt. Claim 34 was rejected as being unpatentable over Weschenfelder in view of Chretinat and further in view of Schmitt. For the reasons to be discussed below, it is believed that the claims now pending in the subject application are allowable over the various references cited and relied upon, taken either singly or in combination.

As discussed during the interview of December 30, 2008, independent claim 21, which was directed to a printing press, has been cancelled. It is being replaced by new independent claim 37. The language of new claim 37 includes the bulk of the language of claim 21 and also now recites that the printing press includes at least one cylinder drive motor that is selectively positionable in at least one of the prepared connection points that are provided on each of the first and second lateral spaced frames which define first and second sides of the at least first

printing unit in the printing press. Claim 37 is thus a generic claim that incorporates language of claims 21, 27 and original claim 19. Claim 19 has now been made to depend from new claim 37, as have claims 22-26 and 28. All of these claims are thus directed to a printing press having at least a first printing unit. That first printing unit includes first and second spaced lateral side frames, each of which is adapted to receive an end of the cylinders that extend between the lateral frames. Each spaced lateral frame is recited as having a plurality of prepared connection points. Each of these connection points is adapted to selectively receive an operating element. The lateral frame that receives that operating element is referred to as the operating side of the printing press.

The printing press recited in claim 37 also includes at least one cylinder drive motor. As discussed above, that at least one cylinder drive motor is selectively positionable in one of the plurality of prepared connection points on one of the first and second lateral frames. It could be positioned on the same side as the operating element or on the lateral side frame that does not receive the operating element.

Independent claim 29 has been amended in a manner similar to what was done with claim 21 to arrive at new independent claim 37. Whereas new independent claim 37 is directed to a printing press per se, claim 29 is directed to a printing press installation that includes at least two of the printing presses, such as are recited in claim 37. Claim 29 has been amended to recite the plurality of prepared connection points on each of the first and second spaced lateral frames for each of the at least first and second printing presses. Claim 29 further recites that the first one of the printing presses has the at least one drive motor on the operating side of that first press. The drive motor for the second one of the printing presses is on the side that is opposite to the operating side.

As was discussed with Examiner Banh and with Primary Examiner Colilla, the prior art cited and relied upon does not show, or suggest, the structure of the subjection invention, as set forth in new claim 37 and in presently amended claim 29. Referring initially to the Weschenfelder reference, U.S. Patent No. 6,408,746, the Examiner has misconstrued the recitation of first and second lateral frames, as recited in the subject application, and as shown in the Weschenfelder reference. The first and second lateral side frames 23, 24 of Weschenfelder, as depicted in Fig. 1, are not cooperating with said other to support the ends of a single cylinder and to thus form a printing unit. The side frames 23 and 24 of Weschenfelder are each one frame of the two frames which are required to support the ends of the cylinders that extend between them. A top plan view of Fig. 1 of Weschenfelder would show additional frame elements behind the two frame elements 23 and 24.

The Examiner is incorrect in his assertion that Weschenfelder shows one operating side, as seen in Fig. 2, as being the side of the press facing the operator 55. In Fig. 2, the operator 55 is standing between a pair of press components which, in their operational position, would be configured as depicted on the top left of Fig. 3. An operating side, as it is typically understood, is the side of the press that is easily accessed by a press operator. For example, the operating side might be the side that is depicted in Fig. 2. Again, it would require a top plan view or a perspective view to see both the operating side and the side opposite the operating side. The Examiner's characterization of the Weschenfelder reference is contrary to the ordinary understanding in the art.

The Weschenfelder reference is directed to the provision of modular units, each of which includes side frames, cylinders, drive motors and the like. These modules are positionable, as modules, in desired arrangements. There is no discussion of a plurality of prepared connection

points that can receive operating elements or drive motors. In Weschenfelder, the drive motors "... remain fixedly arranged to a lateral frame." as recited at Column 2, lines 5 and 6. This is again discussed at Column 3, starting at line 14. The drive motors are fixedly arranged on a lateral frame "... independently of the position and location of placement of the printing units.". This is clearly the opposite of the present invention where the placement of the operating elements and of the drive motors is dependant on the placement of the printing units.

The secondary reference to Chretinat was cited as showing a controller for controlling the press. It was asserted that such a controller could be placed on the operating side of the press. The undersigned respectfully disagrees.

In Chretinat, there is shown a remote control panel 6 (emphasis added) which is clearly situated away from the press 17, as seen in Fig. 1. The remote control panel 6 of Chretinat would be more analogous to the operating console 1001 of the subject invention. It is usable to analyze printed pages for proper color alignment and includes a table which is big enough to receive two pages of printed material, as shown in Fig. 4. Such a remote control panel 6 is intended, as its name suggests, to be kept remote from the printing press. Its combination with Weschenfelder would not result in the subject invention, as recited in new claim 37 and in presently amended claim 29.

The Hasegawa reference does not supply the teachings of either new independent claim 37 or of currently amended independent claim 29 that are missing from the combination of Weschenfelder and Chretinat. In Hasegawa, there is shown a stencil printing device or a mimeograph. A bottle of ink 17 is located inside a printing drum 7 and is used to supply ink to an ink delivery pipe 23 which is also located inside the rotating drum 7. An ink supply pump 19 is also placed inside the rotating drum 7 and is used to control the flow of ink from the bottle 17

to the delivery pipe 23. A control system, as depicted in Fig. 2, is also situated inside the printing drum 7. That control system is usable to control the ink supply pump 19 and other elements of the stencil printing device which are located within the printing drum 7. That control system is connected to a control unit 67 by an arrangement of LED devices. As recited at Column 5, lines 24-29, the control unit is "... of the main body frame.". It is not recited as being on the main body frame (emphasis added). There is no teaching in Hasegawa of connection points on a frame for the printing control unit 67. As depicted in Figs. 2 and 4 of the Hasegawa reference, the control unit 67 is physically separate from the main frame 1. Column 5, lines 23-30 do not provide any teaching of connection points, as asserted by the Examiner. Thus, Hasegawa does not add anything of substance to the teaching of Weschenfelder and Chretinat.

While the several additional secondary references may be of possible interest to selected ones of the dependant claims, they do not provide any of the teachings which are missing from the Weschenfelder, Chretinat and Hasegawa references. The deficiencies of these references, as discussed above, are not provided by these additional secondary references. No further discussion thereof is believed to be required.

The Substitute Specification is being amended a second time. As was discussed during the interview of December 30, 2008, paragraphs 002 and 007 are being amended to conform the language of the Substitute Specification to that of the claims. Paragraphs 0057, 0063 and 0065 are being amended to provide uniformity of terminology. These several minor changes do not present any new matter.

SUMMARY

A Request for Continued Examination (RCE) is being filed concurrently. The Substitute Specification is being amended in a manner which does not add any new matter.

The claims are being amended and are believed to patentably define the present invention over the prior art cited and relied on. Allowance of the claims, and passage of the application to issue is respectfully requested.

Respectfully submitted,

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